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MEETING OF CALIFORNIA BAR ASSOCIATION.

THE eighth annual meeting of the California Bar Association held at Santa Barbara on September 27th, 28th and 29th was an unusually successful one. It was notable by reason of the fact that its proceedings possessed a unity of plan which is not often found in such meetings. The key-note of the meeting was expressed in President Bolton's address which laid stress upon the need for thorough reform in judicial organization and methods. The papers presented at the meetings and the discussion of the proposed constitutional amendment, putting in the hands of the Legislature the entire power of establishing the jurisdiction and organization of the courts, emphasized the ideas suggested by the president.

The bar association is coming to be an important factor in

the legal development of the State. Not only has its work during the last year resulted in the enactment of such an important piece of legislation as the uniform Negotiable Instruments Law, but its efforts have also succeeded in directing attention to evils and stimulating useful legislation, even if the measures actually suggested by the association have not been adopted. Such, for example, has been the case in respect to admission to the bar. Though the association has, at every meeting since its organization, gone on record in favor of what may be called the uniform plan of bar admission recommended by the American Bar Association, it has been unsuccessful in inducing the legislature to act favorably upon its recommendations. Finally, however, part of its program has been put into force by legislation, namely, the withdrawal from all law schools of the privilege of admission of their graduates upon motion and the requirement of a definite period of study.

Comment on Recent Cases

ADMIRALTY JURISDICTION: WORKMEN'S COMPENSATION ACTS.—A case in the Supreme Court of the United States, *Southern Pacific Co. v. Jensen*,¹ holds, four justices dissenting,² that a state court of New York is without jurisdiction to try a case arising under its Workmen's Compensation Act, when the injury occurred upon a ship. This decision is of particular importance to California practitioners because it probably overrules a previous California case.³

The ground, briefly stated, upon which the majority of the court principally relied was that, while a state may have power to affect admiralty law in certain particulars, it may not pass any act which contravenes the existing federal admiralty law, whether that federal admiralty law is the result of congressional legislation or exists by the adoption in admiralty courts of general maritime rules, and that, furthermore, any act of a state legislature having this effect is as invalid in a state court

¹ (May 21, 1917), 244 U. S. 205, 37 Sup. Ct. Rep. 524.

² Holmes, Pitney, Brandeis, Clarke, JJ.

³ *North Pacific S. S. Co. v. Industrial Accident Commission* (1917), 53 Cal. Dec. 170, 163 Pac. 199. For a discussion of this case, in one of its aspects, see a note in 5 California Law Review, 491, September, 1917, written and in print before, but published after, *Southern Pacific Co. v. Jensen* was decided. But see n. 18, *infra*.